

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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THE REPUBLIC OF KAZAKHSTAN,

Plaintiff,

-against-

DOES 1-100 INCLUSIVE,

Defendants.  
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: 15 Civ. 1900 (ER)  
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: **NOTICE OF MOTION FOR**  
: **THE ISSUANCE OF A**  
: **LETTER OF REQUEST**  
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PLEASE TAKE NOTICE that, upon the Declaration of Jacques Semmelman dated May 21, 2015 and the exhibits thereto, the Declaration of Mikolaj Pietrzak dated May 21, 2015 and the exhibit thereto, the Declaration of Iryna Voronov dated May 21, 2015 and the exhibits thereto, the Declaration of Yerzhan Mukhitdinov dated May 21, 2015 and the exhibits thereto, the Memorandum of Law in Support of Plaintiff The Republic of Kazakhstan's Motion for the Issuance of a Letter of Request Under the Hague Convention and all prior pleadings and proceedings herein, Plaintiff The Republic of Kazakhstan will move this Court, pursuant to Fed. R. Civ. P. 28(b) and the Hague Convention on the Taking of Evidence Abroad in Civil or Commercial Matters, March 18, 1970, 23 U.S.T. 2555, T.I.A.S. No. 7444 (reprinted at 28 U.S.C. § 1781) for an order granting the issuance of a letter of request, before the Honorable Edgardo Ramos, on a date and time to be determined by the Court, at the United States District Court, Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Courtroom 619.

In accordance with Southern District of New York Local Civil Rule 6.1, opposition papers, if any, shall be served by June 5, 2015, and reply papers, if any, shall be served by June 12, 2015.

Dated: New York, New York  
May 22, 2015

Respectfully submitted,

CURTIS, MALLET-PREVOST,  
COLT & MOSLE LLP

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